

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

STEVE SEGAL, NICK HAMMER, ROBIN
HOUGDAHL, and TODD TERRY, on behalf
of themselves and all others similarly situated

Plaintiffs,

v.

RAYMOND BITAR; NELSON BURTNICK;
FULL TILT POKER, LTD.; TILTWARE,
LLC; VANTAGE, LTD; FILCO, LTD;
KOLYMA CORP. A.V.V.; POCKET KINGS
LTD.; POCKET KINGS CONSULTING
LTD.; RANSTON LTD.; MAIL MEDIA
LTD.; HOWARD LEDERER; PHILLIP IVEY
JR.; CHRISTOPHER FERGUSON;
JOHNSON JUANDA; JENNIFER HARMAN-
TRANIELLO; PHILLIP GORDON; ERICK
LINDGREN; ERIK SEIDEL; ANDREW
BLOCH; MIKE MATUSOW; GUS HANSEN;
ALLEN CUNNINGHAM; PATRICK
ANTONIUS and JOHN DOES 1-100,

Defendants,

Case No. 11 CIV 4521

AFFIDAVIT OF PHILIP STEWART GORDON

1. My full name is Philip Stewart Gordon and I reside in the city of Newport, which is located in Pend Oreille County, in the State of Washington. I have personal knowledge of the following facts, and if called to testify, could testify about the following facts set forth herein. I provide this affidavit in support of my Opposition to Plaintiffs' Application for a Preliminary Injunction Imposing a Constructive Trust, an Accounting and Expedited Discovery.

2. My current residence in Newport, Washington has been my sole residence since March 2010. I have been living in Newport, Washington since January 2009. Other than my current residence, I have resided in the following locations during the following time frames: (1) Henderson, Nevada, from 2005 to 2010; and (2) Las Vegas, Nevada, from 2003 to 2005. At no time have I maintained any residence in the State of New York nor have I ever lived in the State of New York.

3. I own no property in the State of New York.

4. I own no bank accounts in the State of New York.

5. Over the past several years, I have traveled to the State of New York no more than a few times per year. These visits have all been short, typically lasting no more than three days. None of these visits were in connection with my activities for Full Tilt Poker or any of its related entities.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on July 14, 2011 in Newport, Washington.

A handwritten signature in black ink, appearing to read "Philip Stewart Gordon", written over a horizontal line.

Philip Stewart Gordon